

REMARKS

This is in response to the Office Action mailed October 7, 2003, in which claims 6-8 and 11-15 were rejected and claim 9 was objected to. With this Amendment, claims 6, 7, 9, 11 and 14 have been amended and claims 16-21 have been added. Reconsideration of the application as amended is respectfully requested.

In Section 4 of the Office Action, the Examiner rejected claims 6-8 and 11-15 under 35 U.S.C. §102(e) as being anticipated by Akagi et al. (U.S. Patent No. 6,130,797).

In rejecting independent claim 11, the Examiner found Akagi et al., at column 5, lines 35-42 and FIG. 1a, to disclose "a transducer (16) that follows virtual tracks . . . that are concentric to the axis of rotation of the medium and eccentric to the real tracks." [emphasis added] Applicant respectfully disagrees with the Examiner's assessment of the cited passage and figure of Akagi et al. As understood by those skilled in the art, the controlling of a position of the transducer to "follow" a track refers to maneuvering the position of the transducer relative to the position information contained on the storage medium. However, the cited portions of Akagi et al. do not describe the head (16) as being controlled to "follow" any tracks at all. Instead, "the position of the head 16 is fixed on the absolute coordinates by maintaining the current in a voice coil motor for driving the head 16 to be constant, the amplitude of the head movement is 0" as described in column 5, lines 35-38 [emphasis added]. Therefore, Applicant believes that the rejection can be withdrawn because the cited portions of Akagi et al. fail to disclose a method of controlling a position of a "transducer to follow virtual tracks that are substantially concentric to the axis of rotation of the storage medium", as described in independent claim 11. Additionally, Applicant

believes that claims 12-14 are allowable as being dependent from allowable base claim 11, and requests that the rejections be withdrawn.

The Examiner based the rejection of claim 15 on the same reasons set forth for independent claim 11 and its dependents. Accordingly, Applicant submits that claim 15 is allowable for the reasons set forth above because claim 15 includes "an element having . . . a control signal controlling a position of the transducer such that the transducer follows virtual tracks . . ." Therefore, Applicant requests that the rejection be withdrawn.

Applicant has amended independent claim 6 to describe a method of forming compensation equations representing repeatable runout for a plurality of discs, which are then used to control heads corresponding to the discs to follow virtual tracks that are substantially concentric to an axis of rotation of the corresponding disc. Such a method is neither disclosed nor suggest by the prior art including Akagi et al. Accordingly, Applicant believes that claim 6 is allowable and requests that the rejection be withdrawn. Additionally, Applicant believes that claims 7-9 are allowable as being dependent from allowable base claim 6.

Also with this Amendment, Applicant has added new claims 16-21. Claims 16-18 are believed to be allowable as depending from allowable base claim 6. Independent claim 19 is directed to a device that includes a "a plurality of discs . . . a plurality of transducers . . . a plurality of compensation equations . . . and a servo control loop configured to control a position of each transducer to follow virtual tracks that are substantially concentric to the axis of rotation of the corresponding disc using the corresponding compensation equation." Such a device is neither disclosed nor suggest by the prior art including Akagi et al. Accordingly, Applicant believes

that claim 19 is allowable. Additionally, Applicant submits that claims 20 and 21 are allowable as being dependent from allowable base claim 19.

In view of the above comments and remarks, Applicant submits that the present application is in condition for allowance. Reconsideration and favorable action is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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